



5301 Wisconsin Avenue, NW  
Suite 800  
Washington, DC 20015  
T: 202-362-0041  
F: 202-362-2640  
[www.odonoghuelaw.com](http://www.odonoghuelaw.com)

December 01, 2025

**VIA ELECTRONIC FILING**

Honorable Peggy Kuo U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Trustees of the Plumbers Local Union No. 1 Welfare Fund,  
et al. v. Spray in Place Solutions, LLC, et al.* 24 CV 2568 (KAM) (PK)  
Joint Status Report to the Court**

Dear Judge Kuo:

This firm represents Plaintiffs in the above-referenced matter. We write in accordance with the Court's Order dated October 29, 2025, directing the parties to file a joint status report by December 01, 2025, indicating whether there are any remaining disputes, and whether a settlement conference or referral to EDNY Court-Annexed mediation would be fruitful.

**Plaintiffs' Position:**

Following the October 29, 2025 hearing, Defendants failed to inform Plaintiffs of any contributions they dispute and failed to pay any amounts they do not dispute, in direct defiance of the Court's October 29, 2025 Order directing the Defendants to do so by November 7, 2025. Plaintiffs followed up with counsel for the Defendants on November 12, 2025, providing Defendants an opportunity to address and correct their noncompliance. To date, Plaintiffs have not received a response from Defendants.

As further ordered by the Court in the October 29, 2025 Order, Plaintiffs made a settlement demand on November 14, 2025. To date Plaintiffs have not received the Defendants' settlement offer, which was ordered by the Court to be provided by November 25, 2025.

Plaintiffs have complied with all Court-ordered deadlines and are seeing to all their discovery obligations.

Until Defendants inform Plaintiffs of any contributions they dispute, pay any undisputed amounts, and otherwise engage in initial settlement discussions, Plaintiffs submit that a settlement conference or referral to EDNY Court-Annexed mediation would not be fruitful.

**Defendants' Position:**

Defendants respectfully submit that they need additional time to review the Plaintiffs' calculations. Your undersigned counsel last had contact with principals of the Defendants on October 29, 2025 and October 30, 2025 to schedule a meeting to review. Regrettably, your undersigned was unable to schedule a mutually available time and this matter slipped through the proverbial cracks. Defendants respectfully seek an extension of time of eleven (11) days, until Friday, December 12, 2025, to provide a supplemental joint status report in light of your undersigned's schedule this week, which includes two (2) depositions and five (5) court appearances in unrelated matters. See Fed. R. Civ. P. 6(b)(1)(B). Defendants apologize for the delay and thank this Court for its time and attention to this case.

Respectfully submitted,

/s/ Rebecca W. Richardson

Rebecca W. Richardson, Esq.

*Counsel for the Plaintiffs*

/s/ Emanuel Kataev

Emanuel Kataev, Esq.

*Counsel for the Defendants*